DNR/PEI FILE EXCHANGE NOTES

June 22, 2005

Attendees:
Vern Schrunk—DNR
Ken McFadden--PEI

- **POLICY/GUIDANCE AND/OR JUDGMENT ISSUES:**

7LTE45, East Central Iowa REC, Independence, SMR reclassification (H2N) 3 SMRs, 2002 reclassification report, file received 5/4/05, refer to 5/05 emails RC/KM recommend reject, non granular bedrock, T2 conditionally accepted 10/99, High Risk Monitoring (Rev-EM, QA-KM).

As presented in the draft RP letter:

Notes to DNR: Refer to DNR 10/27/1999 letter Tier 2 conditionally accepted as "high risk monitoring" with a bedrock designation of "nongranular." No monitoring certificate issued pending approval of correction to listed deficiencies. A "high risk monitoring" certificate has never been issued.

The Certified Groundwater Professional provides explanations (pages 7, 12, and Appendix 1 of the 5/02 SMR) in an attempt to support the request "recommend that the annual monitoring requirement be waived for this site and that the site be re-classified to No Action Required." While Certified Groundwater Professional statement, explanation, and reasons provided are acknowledged, they are insufficient to support or justify the No Action Required request. Refer to deficiencies #1 and #2 (in particular, deficiency #2). (The Certified Groundwater Professional fails to address the TEH-d and TEH-wo)

"Teleconference" Responsible Party letter format provided. However, if DNR chooses to allow continued "High Risk Monitoring," alternate Responsible Party letter format with monitoring certificate may be warranted or perhaps request a Tier 3 work plan.

For DNR Review: Upon review of the report and file information, we cannot reclassify the site at this time. The site remains classified **high risk**. The site was accepted as nongranular bedrock and drinking water wells are present within 1,000 feet of the site, the benzene target level is 5 ppb. The target level of 5 ppb benzene has not been met. Furthermore and equally important, the groundwater samples collected on 3/1/2000, 9/28/2001, and 5/3/2002 were not analyzed for TEH-d and TEH-wo (Iowa Method OA-2). TEH-d and TEH-wo analysis is required prior to any future reclassification request. Target levels of 1,200 ppb TEH-d and 400 ppb TEH-wo have not been met. The department acknowledges, but does not accept your Certified Groundwater Professionals reasons and explanation for "No Action Required" provided in the 5/23/2002 SMR reclassification report. The bedrock designation is nongranular, therefore, target levels must be met. Note: Ensure future SMRs are submitted utilizing the Bedrock Version 1.20 software. Refer to the Groundwater Professional Bulletin Board web posting dated 1/23/2004.

Issue #1 b (second list "… but must be addressed by your consultant in all future reports"). **Inadequate.** SMR Groundwater Receptor Summary Table is incomplete. "Tier 2 or Computed Risk" for TEH-d and TEH-wo is inappropriately listed at "N". Several at risk drinking water wells (e.g. DWW6, WW7, WW12, and WW13) appear to be high risk and should be indicated as such. Please revise and update using Bedrock Software version 1.20.

The DNR has identified some technical problems in the SMR and require correction in the next SMR submittal. Be aware the comments and problems noted below may affect pathways, receptors, risk classification, site-specific target levels (SSTLs), and the proposed monitoring plan. Your certified groundwater professional should be prepared to discuss how these deficiencies will be addressed during the teleconference.

Concerning the reclassification SMR received on May 23, 2002:

1. The recommended high risk to no action required reclassification for the site is questioned and cannot be accepted. The explanation and reasons provided by your Certified Groundwater Professional are acknowledged (pages 7, 12, and Appendix 1), but are not accepted. Groundwater concentrations at MW-8 are not below the target level of 5 ppb benzene for Groundwater Ingestion to Drinking Water Well pathway. Since the accepted Tier 2 received on 8/6/1999, groundwater benzene concentrations beginning with 40 ppb on 7/29/1998, have increased to 139 ppb on 3/1/2000, again increased to 168 ppb on 9/28/2001, and then decreasing to 43 ppb on 5/3/2002. The site bedrock designation is nongranular. As such, target level for benzene is 5 ppb and must be met due to presence of at-risk Drinking Water Wells. Please continue annual high risk monitoring.
2. Groundwater monitoring is incomplete. The groundwater samples collected on 3/1/2000, 9/28/2001, and 5/3/2002 were not analyzed for TEH-d and TEH-wo (Iowa Method OA-2). Accepted Tier 2 TEH-d concentrations (2,700 ppb at MW-8) and TEH-wo (1,400 ppb at MW-8) collected on 7/29/1998, exceeded the target level of 1,200 ppb and 400 ppb, respectively. TEH-d and TEH-wo analysis of groundwater samples by Iowa Method OA-2 is required prior to any consideration of a No Action Required reclassification. TEH-d and TEH-wo target levels have not been met.
3. The SMR Cover Page "Type of Monitoring" incorrectly and inappropriately presents "Exempt Granular Bedrock". The appropriate bedrock designation is "Nongranular" consistent with the accepted Tier 2 and DNR 10/27/1999 letter. Nongranular high risk monitoring should have been indicated and handwritten. The department acknowledges version 2.40 SMR format is cumbersome for a nongranular bedrock designation.) Ensure the next SMR submission utilizes Bedrock Software version 1.20.

Refer to file deliverables and draft RP letter for additional def's. Files returned today.

- **PROJECT MANAGEMENT**

9LTG45, Former Service Station, Harlan, SMR reclass/RT2 (P4), H2L, recommend reject, contains RC; (Rev-KP, QA-KM)

As presented in the draft RP letter "teleconference format" **Note to DNR/For DNR Legal review:** CGP states the RC forms "have been reviewed and approved by David Wornson". However, this statement is unverifiable since no approval documentation was provided by CGP or located in the department's file. Also, per 4/28/05 telecom between KM(PEI) and KW(DNR) – no documentation in the DNR database. Moreover, the Tier 2 was reevaluated due to in part to soil resampling. Refer to subsequent deficiency #2 which is material and relevant to the SL-PGWS pathway (SL-PGWS-N property boundary) and the site RC. Refer to the SL-PGWS RID map and SSTL table generated by PEI and included in our deliverables.

1. **For DNR review:** The reclassification of the Soil Leaching – Protected Groundwater Source (SL-PGWS) pathway from high risk to NAR is questioned. The department acknowledges Restrictive Covenants (RC) is being placed on the subject property. However, the provided RC documentation is not sufficient to clear the SL-PGWS pathway. Refer to deficiency #2.

2. **For DNR review:** The range of plume was set to 150 degrees. The soil and groundwater source Sw-W dimensions should have been the maximum measured diameter of all source areas. Refer to section 2.6 of the Tier 2 guidance for the requirements. For example, the soil source dimensions Sw-W should have been adjusted and a value of 132 ft should have been used for modeling. With the soil source value of 132 ft, the SL-PGWS RID plume extends off-site to the north (e.g. PGWS-N boundary is identified by the software as high risk with the soil SSTL of 0.83 PPM benzene). Please apply the appropriate soil and groundwater source Sw-W values for Tier 2 modeling. Revise all affected Tier 2 sections, tables and maps as necessary. Note: the RC was not apparently established for the property to the north. The SL-PGWS pathway appears to remain high risk.